

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

JAMES DONALD VANCE, JR.,

Defendant.

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Case No. 1:25-CR-88

Hon. Paul L. Maloney  
U.S. District Judge

**GOVERNMENT'S INITIAL PRETRIAL  
CONFERENCE SUMMARY  
STATEMENT**

**I. DISCOVERY**

**A. Statements of Defendants**

**1. Oral Statements [Rule 16(a)(1)(A)]**

- ☐ There are no written records of oral statements or other oral statements as defined in Rule 16(a)(1)(A).
- ☒ There are the following records of oral statements:
- U.S. Secret Service summary of interview on May 8, 2025
  - U.S. Secret Service summary of interview on December 11, 2018

the substance of which

- ☐ has been disclosed to defense counsel
- ☒ will be disclosed to defense counsel within 7 days of arraignment

**2. Written or Recorded Statements [Rule 16(a)(1)(B)]**

- ☒ There are no written or recorded statements or grand jury testimony of defendant.
- ☐ There are the following written or recorded statements or grand jury testimony:

All written or recorded statements

- ☐ have been disclosed to defense counsel
- ☐ will be disclosed to defense counsel

**B. Defendant's Prior Record [Rule 16(a)(1)(D)]**

- ☐ The government has made due inquiry and is not aware of any prior criminal records.
- ☐ The government has disclosed defendant's prior criminal history.
- ☒ The government is now making inquiry into defendant's prior criminal history.  
The results will be disclosed to defense counsel upon receipt.

C. Documents and Tangible Objects [Rule 16(a)(1)(E)]

- ☐ The government has no documents, tangible objects, or physical evidence required to be disclosed.
- ☒ The government has the following documents, tangible objects, and physical evidence:
  - ☐ Controlled Substances:
  - ☐ Drug Paraphernalia:
  - ☐ Records:
  - ☐ Drug Records:
  - ☐ Firearms:
  - ☐ Inventory (attached)
  - ☒ Other: Social media posts in February, March, and April 2025
- ☐ The government voluntarily notifies the defendant of the following search warrants issued and the warrant returns:
  - ☐ State –
  - ☐ Federal –
- ☐ Defense counsel should make arrangements with

D. Reports of Examinations and Tests [Rule 16(a)(1)(F)]

- ☒ The government has no reports of examinations or tests required to be disclosed by Rule 16.
- ☐ The government has or expects to have reports of the following examinations and tests:

<input type="checkbox"/> Drug Analysis	<input type="checkbox"/> Handwriting	<input type="checkbox"/> Fingerprints
<input type="checkbox"/> DNA	<input type="checkbox"/> Firearms/Nexus	<input type="checkbox"/> Gun Operability
<input type="checkbox"/> Computer Forensics		<input type="checkbox"/> Other:

E. Reciprocal Discovery

- ☒ The government seeks reciprocal discovery.

F. Notice Under FRE 404(b)

- ☐ The government does not presently intend to introduce 404(b) evidence.
- ☒ The government does presently intend to introduce the following 404(b) evidence:
  - 12/10/2018 threat to POTUS posted on internet and interview by U.S. Secret Service regarding same.
- ☐ The government will provide pretrial notice of 404(b) evidence

G. Other Discovery Matters:

**II. TRIAL**

- A. The government requests a ☒ jury ☐ non-jury trial.  
B. Length of trial excluding jury selection is estimated at one day

**III. MISCELLANEOUS**

- ☐ This case may be appropriate for expedited resolution.  
☒ The government is unaware at this time of any known conflict with defendant's representation by counsel. The United States will immediately advise counsel if any such conflict becomes known.  
☐ The government is aware of the following potential conflict(s):  
☒ Government's plea negotiation policy: The government will not move for a Guideline reduction for timely acceptance of responsibility if a guilty plea is entered less than two weeks before the final pretrial conference.

Date: June 12, 2025

/s/ Christopher M. O'Connor  
Assistant United States Attorney